

HON. JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

VALVE CORPORATION,

Plaintiff,

v.

LEIGH ROTHSCHILD, ROTHSCHILD
BROADCAST DISTRIBUTION SYSTEMS,
LLC, DISPLAY TECHNOLOGIES, LLC,
PATENT ASSET MANAGEMENT, LLC,
MEYLER LEGAL, PLLC, AND SAMUEL
MEYLER,

Defendants.

Case No. 2:23-cv-1016

**DECLARATION OF DARIO A.
MACHLEIDT IN SUPPORT OF VALVE'S
MOTION TO COMPEL REGARDING
REQUEST FOR PRODUCTION NOS. 34,
35, AND 37; INTERROGATORY NO. 5;
AND ESI SEARCH TERMS**

NOTE ON MOTION CALENDAR:
June 6, 2025

Complaint Filed: 07/07/2023

1 I, Dario A. Machleidt, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of Washington and am
3 admitted to this Court. I am a lawyer in the law firm of Kilpatrick Townsend & Stockton LLP,
4 counsel for Plaintiff Valve Corporation in the above-referenced action.

5 2. I have personal knowledge of the facts stated in this declaration and, if called upon
6 to do so, I could and would competently testify thereto.

7 3. Attached hereto as **Exhibit 1** is a true and correct copy of a correspondence sent by
8 counsel for Valve to counsel for Defendants, dated May 9, 2025, and bearing the subject line
9 “*Valve v. Corp. v. Leigh Rothschild et al.*, No. 2:23-cv-1016 (W.D. Wash.) – Defendants’
10 counterclaim of infringement of U.S. Patent No. 8,856,221.”

11 4. Attached hereto as **Exhibit 2** is a true and correct copy of a Bloomberg Law article
12 dated October 10, 2024 titled “Starbucks Levels Fraud Claim in New Tactic to Fight Patent Suit”
13 by Michael Shapiro, and available at [https://news.bloomberglaw.com/ip-law/starbucks-levels-](https://news.bloomberglaw.com/ip-law/starbucks-levels-fraud-claim-in-new-tactic-to-fight-patent-suit)
14 [fraud-claim-in-new-tactic-to-fight-patent-suit](https://news.bloomberglaw.com/ip-law/starbucks-levels-fraud-claim-in-new-tactic-to-fight-patent-suit).

15 5. Attached hereto as **Exhibit 3** is a true and correct copy of Defendant Starbucks
16 Corporation’s Amended Answer, Affirmative Defenses, and Counterclaims in Response to
17 Plaintiff’s Complaint in *Analytical Technologies, LLC v. Starbucks Corporation v. counterclaim*
18 *def. Leigh Rothschild*, No. 2:24-cv-004455-JRG-RSP (Lead Case) (E.D. Tex.).

19 6. Attached hereto as **Exhibit 4** is a true and accurate copy of the Declaration of
20 Rothschild Connected Devices Innovations, LLC dated July 10, 2018 in *Rothschild Connected*
21 *Devices Innovations, LLC v. Guardian Protection Services, Inc.*, No. 2:15-cv-01431-JRG-RSP
22 (Lead Case) (E.D. Tex.).

23 7. Attached hereto as **Exhibit 5** is a true and correct copy of Rothschild Connected
24 Devices Innovations, LLC’s Response to ADS Security, LP’s Motion for Order to Show Cause in
25 *Rothschild Connected Devices Innovations, LLC v. Guardian Protection Services, Inc.*, No. 2:15-
26 cv-01431-JRG-RSP (Lead Case) (E.D. Tex.).

27 8. Attached hereto as **Exhibit 6** is a true and correct copy of Docket Navigator party
28 profile for Rothschild Broadcast Distribution Systems, LLC captured on May 12, 2025.

9. Attached hereto as **Exhibit 7** is a true and correct copy of a chart showing corresponding document requests for, and objections/responses from, Defendants Leigh Rothschild (“Rothschild”), Patent Asset Management, LLC (“PAM”), Rothschild Broadcast Distribution Systems, LLC (“RBDS”), and Display Technologies, LLC (“DT” or “Display Technologies”).

10. Attached hereto as **Exhibit 8** is a true and correct copy of correspondence sent by counsel for Valve to counsel for Defendants, dated May 8, 2025, and bearing the subject line “*Valve Corp. v. Leigh Rothschild et al.*, No. 2:23-cv-1016-JNW (W.D. Wash.): April 30 Meet and Confer.”

11. Attached hereto as **Exhibit 9** is a true and correct copy of an email chain between counsel for Valve and counsel for Defendants with the subject “Valve v. Rothschild – Gmail,” with a date range between March 28, 2025 and April 15, 2025.

12. Attached hereto as **Exhibit 10** is a true and correct copy of correspondence sent by counsel for Valve to counsel for Defendants, dated January 22, 2025, and bearing the subject line: “*Valve Corp. v. Leigh Rothschild et al.*, No. 2:23-cv-1016-JNW (W.D. Wash.): Additional responses to Defendants’ search term proposal.”

13. Attached hereto as **Exhibit 11** is a true and correct copy an email chain between counsel for Valve and counsel for Defendants with the subject “Valve v. Rothschild: Defendants’ Missed ESI Disclosure Deadline,” with a date range between March 24, 2025 and March 26, 2025.

14. Attached hereto as **Exhibit 12** is a true and correct copy of a chart showing corresponding document requests for, and objections/responses from, Rothschild, PAM, RBDS, Display Technologies, Samuel Meyler, and Meyler Legal PLLC.

15. Attached hereto as **Exhibit 13** is a true and correct copy of a chart showing corresponding document requests for, and objections/responses from, Rothschild, PAM, RBDS, Display Technologies, Samuel Meyler, and Meyler Legal PLLC.

16. Attached hereto as **Exhibit 14** is a true and correct copy of an email chain between counsel for Valve and counsel for Defendants with the subject “Valve v. Rothschild,” with a date range between March 11, 2025 and March 19, 2025.

17. Attached hereto as **Exhibit 15** is a true and correct copy of the excerpts of Defendant Rothschild Broadcast Distribution Systems, LLC's Responses and Objections to Plaintiff's Second Set of Interrogatories, served on April 4, 2025.

18. Attached hereto as **Exhibit 16** is a true and correct copy of an email chain between counsel for Valve and counsel for Defendants with the subject “Valve v. Rothschild, 2:23-1016-JNW: LCR 37 Joint Submission - Valve's Opening Portion,” with a date range between May 14, 2025 and May 15, 2025.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 16, 2025 at San Diego, California.

/s/ Dario A. Machleidt
Dario A. Machleidt